

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

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| <b>FUND TEXAS CHOICE, et al.,</b><br><br><b>Plaintiffs,</b><br><b>v.</b><br><br><b>JOSÉ GARZA, in his official capacity as<br/>District Attorney of Travis County, Texas, et<br/>al.,</b><br><br><b>Defendants.</b> | <b>Civil Case No. 1:22-cv-00859-RP</b> |
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**PLAINTIFFS' DESIGNATION OF EXPERTS**

Plaintiffs Fund Texas Choice, The North Texas Equal Access Fund, The Lilith Fund for Reproductive Equity, Frontera Fund, The Afiya Center, West Fund, Jane's Due Process, Clinic Access Support Network, Buckle Bunnies Fund, and Dr. Ghazaleh Moayed, DO, MPH, FACOG, ("Plaintiffs") now file and serve their Expert Designations pursuant to Federal Rule of Civil Procedure 26(a)(2).

Plaintiffs may present testimony from the following expert witnesses at trial or other hearings in this matter:

**1. Dr. Ghazaleh Moayed**

Plaintiffs designate Plaintiff Dr. Ghazaleh Moayed, DO, MPH, FACOG ("Dr. Moayed") as a non-retained expert pursuant to Rule 26(a)(2)(C). Dr. Moayed can be reached through counsel for Plaintiffs.

**i. The subject matter on which the witness is expected to present evidence.**

Dr. Moayed will testify on the subjects of providing reproductive healthcare, the procedures and science related to abortion care, the safety and effectiveness of abortion care, the different types

of abortion care, complications and interventions related to pregnancy and abortion, medical ethics, professional judgment in the practice of medicine, and the demographic makeup of the populations she serves as a physician providing abortion care.

**ii. A summary of the facts and opinions to which the witness is expected to testify.**

Dr. Moayedí will testify as to the mechanics and science related to pregnancy and abortion care, including complications that may arise and interventions that may be necessary. Dr. Moayedí will also testify, based on her years of experience as a healthcare provider, about the process of terminating a pregnancy and the drugs used in medication abortions. Dr. Moayedí will testify that, in her opinion, the laws that prohibit abortion in Texas also impose on physicians a severe ethical burden, by potentially threatening criminal liability for following the professional medical standard of care. In support of her opinions, Dr. Moayedí will rely on her knowledge from her many years of experience providing legal abortion care.

**2. Elizabeth G. Myers**

Plaintiffs designate their counsel Elizabeth G. Myers as a non-retained expert pursuant to Rule 26(a)(2)(C). Ms. Myers' business address is given in the signature block below.

**i. The subject matter on which the witness is expected to present evidence.**

Ms. Myers will testify as to the reasonable and necessary attorney fees incurred in the prosecution of this matter in connection with Plaintiffs' claim for attorneys' fees.

**ii. A summary of the facts and opinions to which the witness is expected to testify.**

The case is ongoing, so Ms. Myers cannot presently state what her final opinions regarding a reasonable and necessary fee award will be, but she will testify that the fees incurred and ultimately requested by Plaintiffs are reasonable and necessary under the circumstances given the relevant state and federal professional disciplinary rules, the geographical location of the case, the prevailing fees

in similar cases of similar complexity, the hourly fees ordinarily charged for attorneys with experience comparable to those employed in this case, the time and labor required, the novelty and difficulty of questions involved, the amount involved and the results obtained, the relationship with the client, and other relevant factors including her personal knowledge as counsel in this matter. In coming to her opinion, Ms. Myers will review the relevant attorneys' fees records.

Dated: July 15, 2024

Respectfully submitted,

By: /s/ Jennifer R. Ecklund

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2024, I caused the foregoing to be served electronically on all parties by operation of the Court's CM/ECF system.

/s/ Elizabeth G. Myers

Elizabeth G. Myers